

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR)	
Plaintiff, Pro Se)	
)	Case No. 5:23-CV-109
VS)	
)	
BRIAN MARK KRASSENSTEIN, et al)	
<hr style="width: 40%; display: inline-block; vertical-align: bottom;"/> Defendants.)	

**PLAINTIFF UNOPPOSED MOTION FOR LEAVE TO FILE SEPARATE
INDEPENDENT RESPONSE SPECIFIC TO DEFENDANTS MULTIPLE
ALTERNATIVE, Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404**

PLAINTIFF, Lawrence (Larry) W. Sinclair respectfully files **PLAINTIFF
UNOPPOSED MOTION FOR LEAVE TO FILE SEPARATE INDEPENDENT
RESPONSE SPECIFIC TO DEFENDANTS MULTIPLE ALTERNATIVE, Motion to
Transfer Venue Pursuant to 28 U.S.C. § 1404** and states as follows.

Pursuant to LR7. CIVIL PRETRIAL MOTION PRACTICE plaintiff contacted defendants via email on Tuesday February 13, 2024 at 7:15 am asking if defendants would consent to plaintiff filing separate independent response to the multiple duplicated ‘Alternative motions to transfer venue pursuant to 28 U.S.C. § 1404.’ On February 13,

2024 at 9:46am plaintiff received reply from defendants counsel of record stating the following:

Mr. Sinclair,

I'm not exactly sure what you're asking for here. **But we're unopposed to you filing "separate independent response[s] specific to alternative motions."**

Wherefore plaintiff respectfully asks this Honorable Court to GRANT plaintiff leave to file separate independent responses specific to defendants multiple Alternative Motions attached to DKT 20 and DKT 21 and referenced by defendants repeatedly in multiple replys with response specific to the Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404.

Submitted this 15th day of February 2024 Laredo, Texas.

Respectfully Submitted,
Lawrence Sinclair
Lawrence (Larry) W. Sinclair
Plaintiff, Pro Se
Mailing Address
1520 Sherman Street
Laredo, Texas 78040
602-583-3626
Email: lsnewsgroup@gmail.com

CERTIFICATE OF SERVICE

I Lawrence (Larry) W. Sinclair HEREBY certify that a true and correct copy of the foregoing **PLAINTIFF UNOPPOSED MOTION FOR LEAVE TO FILE SEPARATE INDEPENDENT RESPONSE SPECIFIC TO DEFENDANTS MULTIPLE ALTERNATIVE, Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404** has been furnished electronically by email (because Counsel for Defendants has not yet entered his appearance in the courts electronic filing system permitting selection for ECF-CM service) Charles A. Bennett cbennett@bennettlegal.com Counsel for Defendants this 15th day of February, 2024.

Lawrence Sinclair

Lawrence (Larry) W. Sinclair
Plaintiff, Pro Se
1520 Sherman Street
Laredo, Texas 78040
602-583-3626
Email: lsnewsgroup@gmail.com